

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Avenue**
5 **South Pasadena, CA 91030**

6 **Tel: 626-799-9797**
7 **Fax: 626-799-9795**
8 **TPRLAW@att.net**

9 **Attorneys for Plaintiff**
10 **G & G Closed Circuit Events, LLC**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 **G & G CLOSED CIRCUIT EVENTS, LLC,**

CASE NO. 3:12-cv-01036-NC

15 **Plaintiff,**

PLAINTIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE; AND
ORDER (~~Proposed~~) AS MODIFIED

16 **vs.**

17 **HELOISA CASTRO, et al.**

18 **Defendants.**

19 **TO THE HONORABLE NATHANAEL M. COUSINS, THE PARTIES AND THEIR**
20 **ATTORNEY/S OF RECORD:**

21 Plaintiff G & G Closed Circuit Events, LLC, hereby applies *ex parte* for an order continuing
22 the Initial Case Management Conference in this action, presently set for Wednesday, June 13, 2012 at
23 2:00 p.m. to a new date approximately thirty (30) to forty-five (45) days forward. This request is
24 necessitated by the fact that the Defendants Heloisa Castro and Claudio Almeida Waqued have not yet
25 answered Plaintiff's Complaint.

26 As such, as of this writing, Plaintiff has yet to receive an answer or any other responsive
27 pleading from the defendant. As a result, Plaintiff's counsel has not conferred with the defendants
28 concerning the claims, discovery, settlement, ADR or any of the other pertinent issues involving the
case itself or the preparation of a Joint Case Management Conference Statement.

PLAINTIFF'S *EX PARTE* APPLICATION FOR AN
ORDER CONTINUING INITIAL CASEMANAGEMENT
CONFERENCE; AND ORDER (~~Proposed~~)
CASE NO. 3-12-CV-01036-NC
PAGE 1

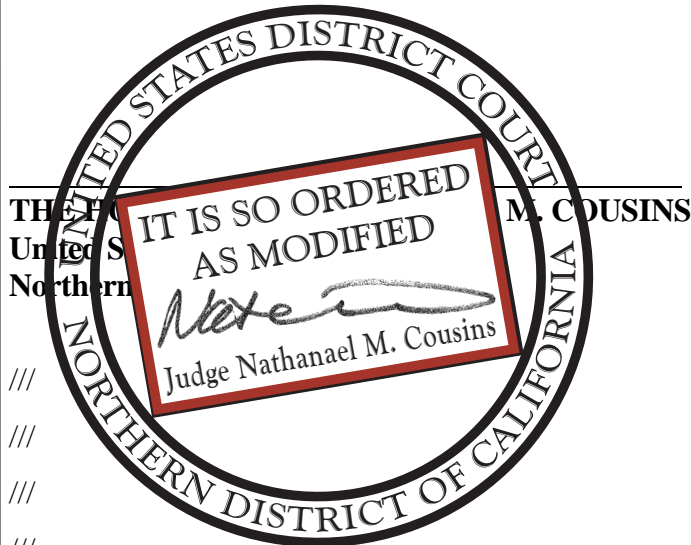
ORDER (Proposed)

It is hereby ordered that the Initial Case Management Conference in civil action number 3:12-cv-01036-NC styled *G & G Closed Circuit Events, LLC v. Heloisa Castro, et al.*, is ^{continued.} ~~hereby vacated.~~

Plaintiff shall also serve a copy of this Order on the Defendants and thereafter file a Certification of Service of this Order with the Clerk of the Court.

The Case Management Conference is set for August 1, 2012 at 10:00 a.m. Parties shall file a joint case management statement no later than July 25, 2012.

IT IS SO ORDERED:



Dated: June 7, 2012

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 6, 2012, I served:

**PLAINTIFF'S *EX PARTE* APPLICATION FOR AN ORDER CONTINUING
INITIAL CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed)**

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Heloisa Castro (Defendant)
4115 Concord Blvd., Suite 70
Concord, CA 94519

Claudio Almeida Waqued (Defendant)
4115 Concord Blvd., Suite 70
Concord, CA 94519

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct, and that this declaration was executed on February 21, 2012, at South Pasadena, California.

Dated: June 6, 2012

/s/ Maria Baird

MARIA BAIRD